

REMARKS

Claims 2-45 are pending in the application.

Claims 2-45 stand rejected.

Claims 2, 3, 24 and 25 are amended.

Claims 23 and 45 are canceled.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. Applicants have also canceled claims in order to clarify the issues for prosecution. By these amendments and cancellations, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

Formal Matters

Claims 2 and 24 are objected to because of informalities. Applicants respectfully submit that in light of the above amendments to Claims 2 and 24 these objections are moot.

Rejection of Claims under 35 U.S.C. §101

Claims 2-45 stand rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully traverse this rejection.

Independent Claims 2 and 24, as amended, include limitations directed toward storing data in a specific intermediate data structure. It is well-established that storage of data is a

tangible and useful result within the context of 35 U.S.C. § 101. Further, data is both received from source systems and provided to a target system, which is a further useful result in the context of the present invention.

For at least these reasons, Applicants submit that independent Claims 2 and 24, as amended, and all claims depending therefrom, are directed toward statutory subject matter within the meaning of 35 U.S.C. § 101 and are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Rejection of Claims under 35 U.S.C. §112

Claims 2-45 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Claims 2-45 also stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement.

Applicants respectfully submit that in light of the amendments to independent Claims 2 and 24, the rejections under 35 U.S.C. § 112 are moot.

Rejection of Claims under 35 U.S.C. §103

Claims 2 and 24 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,727,158 issued to Bouziane et al. (Bouziane) and U.S. Patent No. 6,377,952 issued to Inohara et al. (Inohara).

Claims 3-23 and 25-45 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Bouziane in view of Inohara and further in view of U.S. Patent No. 7,124,112 issued to Guyan, et al. (Guyan).

In order for a claim to be rendered invalid under 35 U.S.C. §103, the subject matter of the claim as a whole would have to be obvious to a person of ordinary skill in the art at the time the invention was made. *See* 35 U.S.C. §103(a). This requires: (1) the reference(s) must teach or suggest all of the claim limitations; (2) there must be some teaching, suggestion or motivation to combine references either in the references themselves or in the knowledge of the art; and (3) there must be a reasonable expectation of success. *See* MPEP 2143; MPEP 2143.03; *In re Rouffet*, 149 F.3d 1350, 1355-56 (Fed. Cir. 1998).

Independent Claims 2 and 24, as amended, each contain limitations of substantially the following form:

managing enterprise data, wherein said managing enterprise data comprises
receiving first data in a first format from a first source system;
receiving second data in a second format from a second source system;
storing the first data and the second data in an intermediate format, wherein
the intermediate format is defined by a plurality of common objects,
the intermediate format comprises a schema defining a plurality of
common data type elements accessible by each of the plurality of common
objects, and
a data element defined by one of the common data type elements has a
consistent structure in each common object using that data element; and
providing the stored first data and second data to a target system in a target
format.

See, e.g., Claim 2 (amended). Applicants respectfully submit that neither Bouziane nor Inohara, alone or in combination, provide disclosure of all of these claim limitations.

According to the disclosure of Bouziane, Bouziane is purportedly directed to:

An information processing system includes a plurality of data processing tools, an atomic information repository, and a plurality of generated translation engines. Each data processing tool processes data in accordance with an associated data model, and in the process generates access requests for accessing data in accordance with its associated data model. The atomic information repository stores data items using an organization in an atomic data model which corresponds to the combination of the data models associated with all of the tools. Each translation engine is associated with one of the tools. Each translation engine receives an access request from its associated tool in the associated tool's data model and performs a translation operation to translate the request to the repository's atomic data model, and initiates an access operation with the repository in connection with the translated access request. A system manager is provided which can, when a new tool is added to the system, update the repository's atomic data model to reflect the added tool's associated data model, generate a translation engine for the new tool, and also update the translation engines associated with the existing tools to reflect the update. (Bouziane, Abstract)

Bouziane, Abstract.

By further contrast, Inohara is purportedly directed to:

In order to perform format conversion between the formats of a plurality of files without any work by a user, a file system stores a relation between a conversion originating file and a conversion destination file, and synchronously with an issue of a file operation API, the format conversion processes are executed. A user performs only the tasks essential for an application, without taking into consideration various necessary format conversions (either one-step or multi-step). During the user task, it is not necessary to designate a conversion originating file and a timing of format conversion. A user can use always a latest conversion destination file.

Inohara, Abstract.

Applicants respectfully assert that neither Bouziane or Inohara teaches at least the “storing” and “providing” limitations of the independent claims. As an initial point, neither Bouziane or Inohara teaches these limitations, particularly with regard to data stored in an intermediate format being provided to a target system in a target format, where the intermediate format provides the commonality that allows the conversion of the intermediate form into a

target form based on its use of common data type elements that are adapted to be shared across a plurality of data objects in the intermediate form.

The cited sections of Bouziane are purportedly directed to translating a given set of data into a form that can be accessed by one of a number of tools. Thus, Bouziane contemplates only a one-to-many conversion. By contrast, the cited sections of Inohara are purportedly directed to file format conversion, in which the conversion is from a (single) conversion originating file and a (single) conversion destination file. Thus, Inohara contemplates only a one-to-one conversion. Therefore, though Applicants do not concede that one of skill in the art would be motivated to combine their disclosures, the purported combination of Bouziane and Inohara would, at best, provide a one-to-one-to-many conversion.

By marked contrast, the claimed invention is directed to a mechanism for providing many-to-one-to-one or many-to-one-to many conversion. When using the claimed invention, enterprise information in a number of forms is extracted from corresponding source systems into an intermediate format. This intermediate format has data types that provide a commonality that allows the provision of data stored in the intermediate form to a target system in a target format based on its use of common data type elements that are adapted to be shared across a plurality of data objects in the intermediate format. These claimed features allow for the conversion of the various corresponding information into enterprise information in the target format. Thus, in the claimed invention, information is converted from many source formats, into an intermediate format that provides the functionality needed to convert the various corresponding information in the intermediate format into information in the target format.

The Office Action correctly states that Bouziane fails to teach the conversion of information from an intermediate format into a target format. Inohara is said to remedy this

infirmity of Bouziane. Applicants respectfully disagree for the foregoing reasons, and therefore respectfully submit that this rejection is overcome thereby.

For at least these reasons, Applicants submit that the limitations of independent Claims 2 and 24, as amended, and all claims depending therefrom are not disclosed by either the cited sections of Bouziane nor Inohara, alone or in combination, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

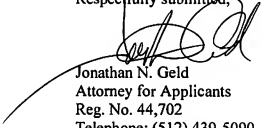
The Office Action further rejects dependent Claims 3 and 25 using the combination of Bouziane, Inohara and Guyan. The Office Action states that Guyan discloses the claimed "payment card type element." Applicants have therefore amended Claims 3 and 25 to remove the "payment card type element." In light of these amendments, and those discussed above, Applicants respectfully submit that the combination of Bouziane, Inohara and Guyan fails to provide disclosure of all the limitations of dependent Claims 3 and 25, and all claims depending therefrom, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,



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